

1 Matthew R. Orr, Bar No. 211097
2 morr@calljensen.com
3 William P. Cole, Bar No. 186772
4 wcole@calljensen.com
5 CALL & JENSEN
6 A Professional Corporation
7 610 Newport Center Drive, Suite 700
8 Newport Beach, CA 92660
9 Tel: (949) 717-3000
10 Fax: (949) 717-3100

11 Appearance *Pro Hac Vice*:
12 Rakesh M. Amin, Illinois Bar No. 6228751
13 rakesh@amintalati.com
14 Ryan M. Kaiser, Illinois Bar No. 6269873
15 ryan@amintalati.com
16 Sanjay S. Karnik, Illinois Bar No. 6300156
17 sanjay@amintalati.com
18 AMIN TALATI & UPADHYE, LLC
19 100 S. Wacker Drive, Suite 2000
20 Chicago, IL 60606
21 Tel: (312) 327-3382
22 Fax: (312) 884-7352

23 Attorneys for Defendant Nutiva, Inc.

24 **UNITED STATES DISTRICT COURT**

25 **NORTHERN DISTRICT OF CALIFORNIA**

26 PRESTON JONES and SHIRIN
27 DELALAT, on behalf of themselves, all
28 others similarly situated, and the general
public,

Plaintiff,

vs.

NUTIVA, INC.,

Defendant.

Case No. 4:16-cv-00711 HSG

**STIPULATED REQUEST TO
MODIFY BRIEFING SCHEDULE ON
PLAINTIFF PRESTON JONES'
MOTION FOR ATTORNEYS' FEES
AND COSTS**

Judge: Hon. Haywood S. Gilliam, Jr.

Complaint Filed: January 8, 2016

Trial Date: None Set

CALL &
JENSEN
EST. 1981

1 Plaintiffs Preston Jones and Shirin Delalat, and Defendant Nutiva, Inc.
 2 (“Nutiva”), hereby stipulate to and request that the Court modify the briefing schedule
 3 on Plaintiff Preston Jones’ Motion for Attorneys’ Fees and Costs (Dkt. No. 86), as
 4 follows:

5 WHEREAS, on May 22, 2017, Plaintiff Preston Jones filed a Motion for
 6 Attorneys’ Fees and Costs, with a hearing date set for July 13, 2017;

7 WHEREAS, Nutiva’s opposition to said motion is currently due on June 5, 2017;

8 WHEREAS, Nutiva’s counsel preparing the opposition is also preparing lengthy
 9 post-arbitration briefing in another matter, which briefing is due June 2, 2017;

10 WHEREAS, Nutiva’s counsel preparing the opposition is also preparing for
 11 mediation, including a mediation brief, in another class action on June 5, 2017;

12 WHEREAS, the motion for attorneys’ fees and costs is accompanied by
 13 approximately 180 pages of declarations and exhibits, requiring time to review and
 14 analyze;

15 WHEREAS, the parties agree that Nutiva’s time to file an opposition to the
 16 motion for attorneys’ fees and costs should be extended by one-week;

17 WHEREAS, no previous extension has been requested regarding Plaintiff Preston
 18 Jones’ motion, the extension will not affect the hearing date on the motion, and the
 19 extension will not affect any other dates in the case;

20 THEREFORE, the parties stipulate and respectfully request that the Court order:

21 1. Nutiva’s opposition to Plaintiff Preston Jones’ Motion for Attorneys’ Fees
 22 and Costs shall be due on or before June 12, 2017;

23 2. Plaintiff Preston Jones’ reply in support of his Motion for Attorneys’ Fees
 24 and Costs shall be due on or before June 19, 2017; and

25 3. The hearing on Plaintiff Preston Jones’ Motion for Attorneys’ Fees and
 26 Costs shall remain July 13, 2017 at 2:00 p.m.

27 **IT IS SO STIPULATED.**

28 **[COUNSEL SIGNATURES ON FOLLOWING PAGE]**

1
2 Dated: June 1, 2017

3
4 CALL & JENSEN
5 A Professional Corporation
6 Matthew R. Orr
7 William P. Cole

8
9 By:/s/ *William P. Cole*
10 William P. Cole

11
12 Appearance *Pro Hac Vice*:
13 AMIN TALATI UPADHYE, LLP
14 Rakesh M. Amin
15 Ryan M. Kaiser
16 Sanjay S. Karnik

17
18 Attorneys for Defendant Nutiva, Inc.

19
20 Dated: June 1, 2017

21
22 LAW OFFICES OF JACK FITZGERALD, P.C.
23 Jack Fitzgerald
24 Trevor M. Flynn
25 Melanie Persinger

26
27 By:/s/ *Jack Fitzgerald*
28 Jack Fitzgerald

29
30 THE LAW OFFICE OF PAUL K. JOSEPH, PC
31 Paul K. Joseph

32
33 Counsel for Plaintiffs and the Proposed Class

34
35
36
37
38
39
40
41
42
43
44
45
46
47
48
49
50
51
52
53
54
55
56
57
58
59
60
61
62
63
64
65
66
67
68
69
70
71
72
73
74
75
76
77
78
79
80
81
82
83
84
85
86
87
88
89
90
91
92
93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139
140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186
187
188
189
190
191
192
193
194
195
196
197
198
199
200
201
202
203
204
205
206
207
208
209
210
211
212
213
214
215
216
217
218
219
220
221
222
223
224
225
226
227
228
229
230
231
232
233
234
235
236
237
238
239
240
241
242
243
244
245
246
247
248
249
250
251
252
253
254
255
256
257
258
259
260
261
262
263
264
265
266
267
268
269
270
271
272
273
274
275
276
277
278
279
280
281
282
283
284
285
286
287
288
289
290
291
292
293
294
295
296
297
298
299
300
301
302
303
304
305
306
307
308
309
310
311
312
313
314
315
316
317
318
319
320
321
322
323
324
325
326
327
328
329
330
331
332
333
334
335
336
337
338
339
340
341
342
343
344
345
346
347
348
349
350
351
352
353
354
355
356
357
358
359
360
361
362
363
364
365
366
367
368
369
370
371
372
373
374
375
376
377
378
379
380
381
382
383
384
385
386
387
388
389
390
391
392
393
394
395
396
397
398
399
400
401
402
403
404
405
406
407
408
409
410
411
412
413
414
415
416
417
418
419
420
421
422
423
424
425
426
427
428
429
430
431
432
433
434
435
436
437
438
439
440
441
442
443
444
445
446
447
448
449
450
451
452
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487
488
489
490
491
492
493
494
495
496
497
498
499
500
501
502
503
504
505
506
507
508
509
510
511
512
513
514
515
516
517
518
519
520
521
522
523
524
525
526
527
528
529
530
531
532
533
534
535
536
537
538
539
540
541
542
543
544
545
546
547
548
549
550
551
552
553
554
555
556
557
558
559
550
551
552
553
554
555
556
557
558
559
560
561
562
563
564
565
566
567
568
569
570
571
572
573
574
575
576
577
578
579
580
581
582
583
584
585
586
587
588
589
589
590
591
592
593
594
595
596
597
598
599
599
600
601
602
603
604
605
606
607
608
609
6010
6011
6012
6013
6014
6015
6016
6017
6018
6019
6020
6021
6022
6023
6024
6025
6026
6027
6028
6029
6030
6031
6032
6033
6034
6035
6036
6037
6038
6039
6040
6041
6042
6043
6044
6045
6046
6047
6048
6049
6050
6051
6052
6053
6054
6055
6056
6057
6058
6059
6060
6061
6062
6063
6064
6065
6066
6067
6068
6069
60610
60611
60612
60613
60614
60615
60616
60617
60618
60619
60620
60621
60622
60623
60624
60625
60626
60627
60628
60629
60630
60631
60632
60633
60634
60635
60636
60637
60638
60639
60640
60641
60642
60643
60644
60645
60646
60647
60648
60649
60650
60651
60652
60653
60654
60655
60656
60657
60658
60659
60660
60661
60662
60663
60664
60665
60666
60667
60668
60669
60670
60671
60672
60673
60674
60675
60676
60677
60678
60679
60680
60681
60682
60683
60684
60685
60686
60687
60688
60689
60690
60691
60692
60693
60694
60695
60696
60697
60698
60699
606100
606101
606102
606103
606104
606105
606106
606107
606108
606109
606110
606111
606112
606113
606114
606115
606116
606117
606118
606119
606120
606121
606122
606123
606124
606125
606126
606127
606128
606129
606130
606131
606132
606133
606134
606135
606136
606137
606138
606139
606140
606141
606142
606143
606144
606145
606146
606147
606148
606149
606150
606151
606152
606153
606154
606155
606156
606157
606158
606159
606160
606161
606162
606163
606164
606165
606166
606167
606168
606169
606170
606171
606172
606173
606174
606175
606176
606177
606178
606179
606180
606181
606182
606183
606184
606185
606186
606187
606188
606189
606190
606191
606192
606193
606194
606195
606196
606197
606198
606199
606200
606201
606202
606203
606204
606205
606206
606207
606208
606209
606210
606211
606212
606213
606214
606215
606216
606217
606218
606219
606220
606221
606222
606223
606224
606225
606226
606227
606228
606229
606230
606231
606232
606233
606234
606235
606236
606237
606238
606239
606240
606241
606242
606243
606244
606245
606246
606247
606248
606249
606250
606251
606252
606253
606254
606255
606256
606257
606258
606259
606260
606261
606262
606263
606264
606265
606266
606267
606268
606269
606270
606271
606272
606273
606274
606275
606276
606277
606278
606279
606280
606281
606282
606283
606284
606285
606286
606287
606288
606289
606290
606291
606292
606293
606294
606295
606296
606297
606298
606299
606300
606301
606302
606303
606304
606305
606306
606307
606308
606309
606310
606311
606312
606313
606314
606315
606316
606317
606318
606319
606320
606321
606322
606323
606324
606325
606326
606327
606328
606329
606330
606331
606332
606333
606334
606335
606336
606337
606338
606339
606340
606341
606342
606343
606344
606345
606346
606347
606348
606349
606350
606351
606352
606353
606354
606355
606356
606357
606358
606359
606360
606361
606362
606363
606364
606365
606366
606367
606368
606369
606370
606371
606372
606373
606374
606375
606376
606377
606378
606379
606380
606381
606382
606383
606384
606385
606386
606387
606388
606389
606390
606391
606392
606393
606394
606395
606396
606397
606398
606399
606400
606401
606402
606403
606404
606405
606406
606407
606408
606409
606410
606411
606412
606413
606414
606415
606416
606417
606418
606419
606420
606421
606422
606423
606424
606425
606426
606427
606428
606429
606430
606431
606432
606433
606434
606435
606436
606437
606438
606439
606440
606441
606442
606443
606444
606445
606446
606447
606448
606449
606450
606451
606452
606453
606454
606455
606456
606457
606458
606459
606460
606461
606462
606463
606464
606465
606466
606467
606468
606469
606470
606471
606472
606473
606474
606475
606476
606477
606478
606479
606480
606481
606482
606483
606484
606485
606486
606487
606488
606489
606490
606491
606492
606493
606494
606495
606496
606497
606498
606499
606500
606501
606502
606503
606504
606505
606506
606507
606508
606509
606510
606511
606512
606513
606514
606515
606516
606517
606518
606519
606520
606521
606522
606523
606524
606525
606526
606527
606528
606529
606530
606531
606532
606533
606534
606535
606536
606537
606538
606539
606540
606541
606542
606543
606544
606545
606546
606547
606548
606549
606550
606551
606552
606553
606554
606555
606556
606557
606558
606559
606560
606561
606562
606563
606564
606565
606566
606567
606568
606569
606570
606571
606572
606573
606574
606575
606576
606577
606578
606579
606580
606581
606582
606583
606584
606585
606586
606587
606588
606589
606590
606591
606592
606593
606594
606595
606596
606597
606598
606599
606600
606601
606602
606603
606604
606605
606606
606607
606608
606609
606610
606611
606612
606613
606614
606615
606616
606617
606618
606619
606620
606621
606622
606623
606624
606625
606626
606627
606628
606629
606630
606631
606632
606633
606634
606635
606636
606637
606638
606639
606640
606641
606642
606643
606644
606645
606646
606647
606648
606649
606650
606651
606652
606653
606654
606655
606656
606657
606658
606659
606660
606661
606662
606663
606664
606665
606666
606667
606668
606669
606670
606671
606672
606673
606674
606675
606676
606677
606678
606679
606680
606681
606682
606683
606684
606685
606686
606687
606688
606689
606690
606691
606692
606693
606694
606695
606696
606697
606698
606699
606700
606701
606702
606703
606704
606705
606706
606707
606708
606709
606710
606711
606712
606713
606714
606715
606716
606717
606718
606719
606720
606721
606722
606723
606724
606725
606726
606727
606728
606729
606730
606731
606732
606733
606734
606735
606736
606737
606738
606739
606740
606741
606742
606743
606744
606745
606746
606747
606748
606749
606750
606751
606752
606753
606754
606755
606756
606757
606758
606759
606760
606761
606762
606763
606764
606765
606766
606767
606768
606769
606770
606771
606772
606773
606774
606775
606776
606777
606778
606779
606780
606781
606782
606783
606784
606785
606786
606787
606788
606789
606790
606791
606792
606793
606794
606795
606796
606797
606798
606799
606800
606801
606802
606803
606804
606805
606806
606807
606808
606809
606810
606811
606812
606813
606814
606815
606816
606817
606818
606819
606820
606821
606822
606823
606824
606825
606826
606827
606828
606829
606830
606831
606832
606833
606834
606835
606836
606837
606838
606839
606840
606841
606842
606843
606844
606845
606846
606847
606848
606849
606850
606851
606852
606853
606854
606855
606856
606857
606858
606859
606860
606861
606862
606863
606864
606865
606866
606867
606868
606869
606870
606871
606872
606873
606874
606875
606876
606877
606878
606879
606880
606881
606882
606883
606884
606885
606886
606887
606888
606889
606890
606891
606892
606893
606894
606895
606896
606897
606898
606899
606900
606901
606902
606903
606904
606905
606906
606907
606908
606909
606910
606911
606912
606913
606914
606915
606916
606917
606918
606919
606920
606921
606922
606923
606924
606925
606926
606927
606928
606929
606930
606931
606932
606933
606934
606935
606936
606937
606938
606939
606940
606941
606942
606943
606944
606945
606946
606947
606948
606949
606950
606951
606952
606

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2017, I electronically filed the foregoing document described as STIPULATED REQUEST TO MODIFY BRIEFING SCHEDULE ON PLAINTIFF PRESTON JONES' MOTION FOR ATTORNEYS' FEES AND COST with the Clerk of the Court using the CM/ECF System which will send notification of such filing via electronic mail to all counsel of record.

/s/ William P. Cole
William P. Cole

CALL &
JENSEN
EST. 1981